

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

WILDER REED,)
)
Plaintiff,)
)
v.) Case No. 1:10-cv-00223-LMB-TCB
)
WASHINGTON GAS LIGHT COMPANY,)
)
Defendant.)

WASHINGTON GAS LIGHT COMPANY'S DISCOVERY PLAN

Washington Gas Light Company (Washington Gas), by counsel, submits the following discovery plan pursuant to the court's Scheduling Order (03/17/2010):

April 7, 2010.....Pretrial Conference.

July 9, 2010.....Completion of Discovery.

July 15, 2010.....Final Pretrial Conference.

Washington Gas intends to propound interrogatories, to request the production of documents and admissions, and to take the depositions of the plaintiff, as well as witnesses identified through discovery.

Washington Gas has not been able to propound discovery in view of plaintiff's "Motion To Stay Proceedings And Motion To Withdraw As Counsel," a copy of which (along with e-mails from counsel) is attached hereto.

Respectfully submitted,

/s/

L. Edward Funk, Esq.
(VA Bar # 30003)
Paul H. Teague, Esq.,
(VA Bar # 72458)
Attorneys for
Washington Gas Light Company
101 Constitution Avenue, NW
Washington, D.C. 20080
(202) 624-6331
(202)624-6040 (fax)

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 30th day of March, 2010, I caused a copy of the foregoing, Washington Gas Light Company's Discovery Plan, to be served, electronically, or via FedEx on Morris E. Fischer, Esq., 4550 Montgomery Avenue, Suite 601N, Bethesda, MD 20814.

/s/

Ed Funk

UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
Alexandria Division

Wilder Reed)
)
)
Plaintiff,)
)
)
v.) Case Number: 1:10cv223 (LMB/TCB)
)
Washington Gas Light Company)
)
)
Defendant.)
)

MOTION TO STAY PROCEEDINGS
AND MOTION TO WITHDRAW AS COUNSEL

Undersigned counsel, Morris E. Fischer, hereby moves this Honorable Court to withdraw as counsel in the above-captioned matter. Plaintiff, by and through the undersigned counsel, hereby moves this court to stay all proceedings and submission due dates in the above-referenced matter, including, but not limited to, the pretrial conference scheduled for Wednesday, April 7, 2010, for at least sixty (60) calendar days. In support of this motion, the undersigned counsel hereby submits the following:

1. Said Counsel is not admitted to practice before this Honorable Court.
2. No trial date has been set and discovery has not commenced.
3. Counsel for Defendant, Larry Edward Funk, indicated by email on March 25, 2010 that Washington Gas neither consents nor objects to this motion.
4. Counsel has served a copy of this motion and notice advising Plaintiff to obtain other counsel, or if Plaintiff intends to conduct the case pro se or to object to the withdrawal, to so notify the clerk in writing within five (5) days of service of this motion.

5. Counsel has discussed this matter with Plaintiff ; Plaintiff concurs with counsel's withdrawal, and Plaintiff intends to seek other counsel.
6. Plaintiff wished to stay all proceedings and due dates to allow time to seek and obtain other counsel.

Respectfully Submitted,

March 25, 2010



Morris E. Fischer, Esq.
MD Bar No. 26286
Air Rights Center
4550 Montgomery Avenue
Suite 601N
Bethesda, MD 20814
(301) 469-3498 phone
(301) 469-3499 fax
Attorney for the Plaintiff

UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
Alexandria Division

Wilder Reed)
)
)
Plaintiff,)
)
v.) Case Number: 1:10cv223 (LMB/TCB)
)
Washington Gas Light Company)
)
Defendant.)
)

CERTIFICATE OF SERVICE

I hereby certify that, on the date shown below, I have caused a copy of this motion, along with a notice advising Plaintiff to obtain other counsel, or if Plaintiff intends to conduct the case pro se or to object to the withdrawal, to so notify the clerk in writing within five (5) days of service of this motion to be served via first class mail, postage pre-paid at Plaintiff's last known home address: Wilder Reed, 1701 Severn Tree Court, Severn, MD 21144.

I hereby certify that on the date shown below, I have caused a copy of the foregoing motion to be served in the manner stated below on the following persons:

Electronic Mail: Larry Edward Funk
 Washington Gas Light Company
 101 Constitution Ave NW
 Washington, DC 20080
efunk@washgas.com

March 25, 2010

Morris Fischer /107
Morris E. Fischer, Esq.
4550 Montgomery Avenue, Suite 601N
Bethesda, MD 20814
(301) 469-3498 phone
(301) 469-3499 fax
Attorney for the Plaintiff

UNITED STATES DISTRICT COURT FOR THE
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Wilder Reed)
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)
Washington Gas Light Company)
)
Defendant.)
)

ORDER

Counsel for Plaintiff, Morris E. Fischer, has come before this Honorable Court requesting to withdraw his appearance as Plaintiff's counsel. This Court hereby finds good cause for such withdrawal, and counsel's request is hereby **GRANTED**.

It is hereby **ORDERED** that Plaintiff's request to stay all proceedings and due dates in the above-captioned matter for at least sixty (60) calendar days is hereby **GRANTED**.

Date: _____

Honorable Judge



"Morris Fischer"
<morris@morrisfischerlaw.co
m>
03/29/2010 03:46 PM

To <efunk@washgas.com>
cc "Morris Fischer" <morris@morrisfischerlaw.com>
bcc
Subject Reed v. Washington Gas

History: This message has been forwarded.

Dear Mr. Funk,

Please see the attached Motion to Stay Proceedings and Motion to Withdraw as Counsel, filed with court via FedEx today.

Thank you,

Jeannette Davis

Paralegal

Morris E. Fischer, Esq.

AirRightsCenter, NorthTower

4550 Montgomery Avenue

Suite601N

Bethesda, MD20814

(301) 469-3498 phone

(301) 469-3499 fax

morris@morrisfischerlaw.com

www.morrisfischerlaw.com

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- Motion to Withdraw - motion to stay FINAL.pdf



LaVonne Torrence
<lavonne.morrisfischerlaw@g
mail.com>
03/25/2010 11:10 AM

To efunk@washgas.com
cc Morris Fischer <morris@morrisfischerlaw.com>
bcc
Subject Reed Wilder vs. Washington Gas

History: This message has been replied to and forwarded.

Counselor:

As you may know, we are counsel for the Plaintiff in the above referenced matter. We propose to file the attached motion with the court today. Please let me know your position.

Regards,

LaVonne

--
LaVonne O. Torrence, Esq.
Law Office of Morris E. Fischer, LLC
Air Rights Center, North Tower
4550 Montgomery Avenue, Suite 601N
Bethesda, MD 20814
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lavonne.morrisfischerlaw@gmail.com

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- Motion to Stay.pdf



LaVonne Torrence
<lavonne.morrisfischerlaw@g
mail.com>
03/25/2010 02:22 PM

To LFunk@washgas.com
cc Morris Fischer <morris@morrisfischerlaw.com>
bcc
Subject Re: Reed Wilder vs. Washington Gas

History: This message has been forwarded.

Not a problem. Thank you for following up. I will make the revision before filing and send a copy to you.

On Thu, Mar 25, 2010 at 2:18 PM, <LFunk@washgas.com>wrote:

LaVonne:

Washington Gas requests that paragraph 3 of your motion read: "Washington Gas neither consents nor objects to this motion."

Regards,
Ed Funk

LaVonne Torrence
<lavonne.morrisfi
scherlaw@gmail.co
m> To
efunk@washgas.com
cc
03/25/2010 11:10 Morris Fischer
AM <morris@morrisfischerlaw.com>
Subject
Reed Wilder vs. Washington Gas

Counselor:

As you may know, we are counsel for the Plaintiff in the above referenced matter. We propose to file the attached motion with the court today. Please let me know your position.

Regards,

LaVonne

--

LaVonne O. Torrence, Esq.
Law Office of Morris E. Fischer, LLC
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(See attached file: Motion to Stay.pdf)

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waiver of any attorney-client, work product or other applicable privilege.
Thank you.